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Planning Application 24/00539/F Oxford United Stadium Development

Yarnton Parish Council object to the above planning application for the following reasons:

Drainage Strategy:

1. The LIDAR mapping shows a substantial area of the site being at risk from pluvial floods. The development plan shows two new areas of open water with a total surface area substantially less than the existing attenuation pond. The pond could be providing important storage for attenuating flows through the site. The scoping of flood risk is limited to the site and downstream.
2. The flood risk chapter of the Environmental Statement does not expressly identify the surface water flows from the Oxford Road (A4165) highway surfaces and drains or the existing Kidlington roundabout drainage. In particular whether any is channeled through the existing site attenuation pond and through the silted culvert under Frieze Way (A4260). The strategy seems to rely upon a presumption that the highway drainage operates independently of the site. Highway drains have to be able to discharge to an open channel ordinary watercourse. There could be significant areas outside of the application red line which may need to be catered for on-site. Little seems to be known about the existing piped drainage.
3. The culvert under the A4260 is said to be 85% silted up. Clearly the Highway Authority decided at some point not to maintain the culvert. This has resulted in the culvert silting up; the watercourse re-establishing its natural bed-level through the culvert and leaving only a fraction of its potential flow capacity. The culvert is of comparatively large diameter laid with an invert at what would appear to be a depth well below the original watercourse bed level initially creating a storage volume under the highway. The developer now requires the owner (OCC) to clear and maintain the culvert at an artificially low level, effectively creating a second inverted syphon; the first one being under the canal. It is an expense that the Highway Authority may not be able to commit to in perpetuity leaving it open to substantial claims for flood damage in future years. Silt removal is not routinely undertaken due to the cost of disposing off-site of contaminated material.

4. De-silting the culvert carries with it the risk of moving attenuation volumes downstream onto the Woodland Trust site, creating wetter conditions, putting the existing trees and woodland habitat at risk.
5. Garden City is known already to suffer a chronic problem with garden flooding and saturated soil conditions. Moving more water downstream will risk exacerbating this issue. Garden City sits on the old Rowel Brook alluvial silt-plain, which was cut off by the construction of the Oxford Canal.
6. The application site, Stratfield Brake, Garden City, and possibly a much wider area, now seems to rely entirely for drainage on the “inverted syphon” under the canal referred to in the Environmental Statement, the condition of which is unknown as by its nature is constantly submerged. The canal is now over 200 years old, in which time it would be surprising to find it remains in entirely good repair. It would also be surprising to find the syphon is clear of silt and continuing to operate at its full capacity.
7. After passing under the canal the watercourse joins King’s Brook/Rowel Brook which are designated main rivers. Moving all or part of the on-site retention volume down into Stratfield Brake and Garden City or even further downstream into the King’s Brook floodplain may simply serve to exacerbate flood risk in other proposed development areas in Kidlington and Yarnton. By itself changes to the flows through the syphon may not have significant impact west of the canal. However, it will be adding to changes that are brought about by the development of PR8, PR9 and PR7a and PR7b. Neither has it been established how the upstream water levels on the proposed Oxford flood relief scheme will impact upon King’s Brook, which itself forms a reach of the River Thames Flood Zone, or upon the syphon and beyond.
8. The Environment Statement chapter 19 discusses risk brought by cumulative effect of multiple development sites in relation to a range of receptors. It concludes with the statement: “No significant cumulative effects are anticipated”. With regards to downstream flood risk this statement appears to have been reached after a site walkover where various pieces of hard infrastructure were simply identified and their function and capacity is assumed in the absence of real data or analysis.
9. The Chapter considers the cumulative flood risk to the development site and the downstream areas to be negligible to low (change to peak water levels 50mm or less). A change to peak levels will similarly result in a change in the annual average water levels particularly in Stratfield Brake and Garden City water table levels. Even a small average annual rise in groundwater levels can extend both in time and scope of what could be described at the moment as “nuisance flooding” of gardens and driveways. This could be dismissed as having a less significant impact than property flooding but it can have a significant impact on the utility and leisure value of gardens, and on mental health and wellbeing. It could also reduce the availability of the Stratfield Brake pitches due to more frequent periods of water-logging. Groundwater levels are already predicted to rise with climate change. There appears to be no information regarding the average water table levels, or the seasonal highs and lows or its further exacerbation by climate change.
10. A deeper dive is required into the flooding mechanisms at work before simply concluding the impact of flood risk to be negligible to low.

Other transport options including parking and buses

1. The proposal states that ‘many of our fans live within 20 minutes walk, cycle, or on public transport of the proposed location’. This is not the case as their principal fan base is located in East Oxford so public transport, cycling or walking would be less desirable. There seems to be little evidence that the current travel profile of fans attending matches which shows 90% travelling by car would change significantly, at

least in the short term. This is likely to lead to problems with congestion and nuisance parking. The Sustainable Transport Statement contained in the application appears to be based on surveys of football supporters, many of whom have an interest in the stadium moving and so would be likely to say they would change their transport choices. This is not a reliable source of data.

2. There are suggestions within the application about bus services being diverted from the Oxford Road to Frieze Way. It's not clear how this would operate and what impact this would have on other parts of the road network of which the vagaries Yarnton is often subject to.
3. Yarnton is wedged between the A40 and the A44. If either/both major roads were to be blocked by traffic there would be absolutely no way in/out of the village. In cases of emergency this could be a serious situation.
4. There is little information about where any chartered coaches or buses will park once they have decanted their passengers. This raises similar concerns to that found in central Oxford where tourist coaches would spend hours with engines idling to keep air conditioning and heating running creating a problem with noise and pollution in the area. How would Yarnton be kept free of this potential problem?
5. The park and ride sites are likely to see an exponential increase in usage as other developments around the area are completed. Yarnton residents regularly use Peartree and Parkway P&R to access Oxford and the surrounding areas. Any consideration of the availability of space on these sites at the moment is likely to be misleading.
6. There's also likely to be increased demand for available space as proposals for traffic filters come into force in central Oxford. These are designed to encourage more use of buses to get in and out of the city, which is likely to mean greater use of P&R facilities.
7. It would seem short-sighted of both the County and District Councils to assume that the current availability of parking at the park and rides is going to be a long term position.
8. Traffic filters that are due to be imposed in central Oxford (in the near future) are also likely to lead to increased use of park and ride sites close to the ring road. This means all these sites are going to have far fewer spaces available. Currently the P&R sites have usages levels of up to 80%. It's extremely likely that there will be far fewer spaces once additional restrictions are imposed on private car use into the city. Again this will impact many of our residents who use these facilities to get to work in the city.
9. Given that 90% fans currently arrive at the existing stadium by car and the application does not provide for any on-site parking for able bodied people, it seems likely that local P&R facilities will be quickly overwhelmed leading to motorists parking in and around the stadium on local roads and further afield when forced to.
10. This would suggest that a large number of parking enforcement officers would be required to police a wide area of temporary controlled parking. It's not evident from the application that they have made sufficient financial and operational resources available to deal with this. Given that there are likely to be 2 matches per week during the main season we would imagine that significant ongoing funding would be required to ensure that residents are not inconvenienced by nuisance parking.
11. There are proposals within the application for temporary controlled parking zones in the 2km area which names Yarnton as being within the zone. There would need to be a planning condition that such zones would be facilitated and enforced by the club on an ongoing basis at their expense and for the foreseeable future.

Road closures

1. There are clear references in the application to road closures and 'diversions'. This demonstrates that they feel that a closure of the road will be vital to facilitate safe access to the site. That being the case, the traffic modelling should accurately reflect that. At the moment it doesn't.
2. Any closure of the Oxford Road is likely to have large knock on effect across the local road network especially up to Cutteslowe on to the A40 on to the M40 as well as the A34 and A44 routes. A reminder that Yarnton is wedged between the A44 and the A40. Along with the potential Sandy Lane closure.
3. All these roads are vital to the smooth running of the local and national network. The capacity of these roads to cope with the extra traffic generated as part of the Local Plan Partial Review sites in Yarnton, Begbroke, Kidlington and Water Eaton needs to be factored in to any traffic planning.
4. We note the suggestion of reactive road closures for a short period of time with associated scenarios where these could be managed on an ongoing basis. These include proposals about speed restrictions with digital signage. However in practice any closure would still have impacts on traffic flow for some time given the flow of traffic on that road. It's also likely that any 'short' closures would probably turn into longer closures.
5. There are nearing 5,000 houses due to be built in the overall area as part of the Local Plan Partial Review along with the expansion of Langford Lane Business Park, Oxford Airport, Begbroke Science Park, Campsfield House Detention Centre reopening and North Oxford Development. This could be an increase of 10,000-20,000 jobs coming to the area, excluding the potential residents. This is going to lead to added stress on the road network which has not been factored into this application.
6. The Yarnton area is to be subjected to nearly 3,000 new dwellings, along with the numerous new jobs being created at the Oxford airport expansion, Langford Lane Business Park a, reopening of Campsfield House Detention Centre and Begbroke Science Park. All these sites are accessed directly by the A44 which can be impacted by various road closures or traffic jams. Not everyone works 9-5pm and Saturdays are often a work day for many.
7. It's stated in the application that OCC agreed with the applicants to use the VISSIM traffic modelling system but that instead they used something different. The applicants say that they will be appending the correct, agreed modelling at a later date. Meanwhile it would seem pointless to examine the current modelling data in any detail. It would be useful to have some clarity on how this aspect will be handled. Will the application be deferred in its entirety or would there just be a period of re-consultation on the traffic proposals?
8. Further comments from Chiltern Railways suggests that they would expect significant S106 contributions from the applicants to cover the cost of increased rolling stock, enlarged station facilities and additional crowd control measures to accommodate increased numbers of rail users on match days and other events. They have also stated that the current facilities at the station were never intended to accommodate this level of intensive usage. Chiltern have also suggested that some contributions may be needed from local authorities. This would all need to be carefully quantified to prevent a sudden requirement for additional future funding that may not be readily available.

Blenheim Palace Events

- I. Over the last decade or more Yarnton has been subjected to numerous road traffic closures, delays and problems due to various events occurring at Blenheim Palace. Whilst we are not objecting to these events, we are very concerned how the traffic from these events will be co-ordinated with traffic for the Stadium?. As repeatedly stated above, Yarnton is a village that relies heavily on the A44 which links up to the A40. Blenheim Palace is situated on the A44. Who will co-ordinate the traffic management and how will it be paid for?

David Thornhill

Parish Clerk

Yarnton Parish Council